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September 23, 2022

VIA CM/ECF

Honorable Valerie Figueredo
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Application Granted

A handwritten signature in black ink, appearing to read 'Valerie Figueredo', written over a horizontal line.

Valerie Figueredo, U.S.M.J.

DATED:

9-27-2022

Re: IMG Memorial Fund I, LLC v. First Landing Fund, LLC, et al., Case No. 1:21-cv-3263-LGS - Joint Letter Requesting 30-day Extension of Stay of Proceedings

Dear Judge Figueredo:

We represent the First Landing Defendants and write jointly with counsel for all parties to request a 30-day extension of the stay of proceedings in this action. On August 30, 2022, via memo endorsement, the Court granted the parties' letter request for a 30-day stay of proceedings as the parties explored settlement (ECF No. 107). The discussion of potential settlement among the parties, which remains ongoing, has taken more time than originally anticipated. Accordingly, the parties respectfully request an additional 30-day extension of the stay of proceedings, through and including October 28, 2022. Should settlement discussions prove unfruitful, the parties will submit a revised proposed Case Management Plan and Scheduling Order no later than the expiration of the extended 30-day stay (on October 28, 2022).

We thank the Court for its time and attention to this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Marion R. Harris', written in a cursive style.

Marion R. Harris

cc: All Counsel (via CM/ECF)